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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1ST TECHNOLOGY LLC, Plaintiff, v. IQ-LUDORUM PLC, PLAYTECH CYPRUS LTD., TILTWARE LLC, and KOLYMA CORPORATION, A.V.V., Defendants.	Case No.: 2:06-cv-323-LDG-RJJ

AFFIDAVIT OF CECILIA P. VENTIMIGLIA IN SUPPORT OF 1ST TECHNOLOGY'S OPPOSITION TO TILTWARE, LLC's MOTION TO DISMISS

I, Cecilia P. Ventimiglia, declare the following:

1. I am an attorney licensed to practice law in the State of Nevada. I am counsel for 1st Technology, LLC in this case, and I have personal knowledge of the following facts, to which I can competently testify.

2. Attached hereto as Exhibit A is a true and accurate copy of Full Tilt Poker's homepage http://www.fulltiltpoker.com/.

3. Attached hereto as Exhibit B is a true and accurate copy of Tiltware's "About Us" web page http://www.tiltware.com/aboutus.php.

Dockets.Justia.com

4. Attached hereto as Exhibit C is a true and accurate copy of the Full Tilt Poker press release web page http://www.fulltiltpoker.com/pressReleases.php?release=45.

5. Attached hereto as Exhibit D is a true and accurate copy of Full Tilt Poker's software download web page http://www.fulltiltpoker.com/download.php.

6. Attached hereto as Exhibit E is a true and accurate copy of Full Tilt Poker's online forum page http://pokerforums.fulltiltpoker.com/viewtopic.php?p=82061&highlight=#82061.

7. Attached hereto as Exhibit F is a true and accurate copy of *Tiltware, LLC And World Famous Poker Players Launch Full Tilt Poker - The Next Generation of Online Poker Software*, http://www.fulltiltpoker.com/pressReleases.php?release=1.

8. Attached hereto as Exhibit G is a true and accurate copy of *Jeff Simpson wonders why there's no crackdown on state's Internet poker players* by Jeff Simpson, LAS VEGAS SUN, Feb. 12, 2006.

9. Attached hereto as Exhibit H is a true and accurate copy of *Easy money, easier addiction?* by Howard Stutz, LAS VEGAS TRIBUNE, Oct. 14, 2005.

10. Attached hereto as Exhibit I is a true and accurate copy of *Full Tilt Poker's Pros Own the Felt at Bellagio and Foxwoods*, Press Release, Apr. 11, 2006.

11. Attached hereto as Exhibit J is a true and accurate copy of *Nevada players ante up online* by Liz Benston, LAS VEGAS SUN, Apr. 15, 2005.

12. Attached hereto as Exhibit K is a true and accurate copy of *Full Tilt Poker to Run $500,000 Las Vegas Tournament -- 100 of the Best Poker Players to Battle for the Top Money*, Press Release.

13. Attached hereto as Exhibit L is a true and accurate copy of *Poker Professional Kristy Gazes Wins $250,000 at the FullTiltPoker.Net Championship at Wynn Las Vegas*, July 14, 2005 eMediaWire Press Release.

14. Attached hereto as Exhibit M is a true and accurate copy of a June 22, 2005 Press Release and discussion from Full Tilt Poker's online discussion forums entitled *FullTiltPoker.net and Fox Sports Net announce a live poker broadcast to showcase the world's top poker players in a $500,000 tournament.*

15. Attached hereto as Exhibit N is a true and accurate copy of *We Do It All Vegas* newsletter article entitled *Both Sides of the Rail.*

16. Attached hereto as Exhibit O is a true and accurate copy of an article from the Cigar Aficionado's Poker Blog entitled *Pokermania*, July 7, 2005.

17. Attached hereto as Exhibit P is a true and accurate copy of an article from PokerNews entitled *The Poker Professor: Interview with Howard Lederer*, July 28, 2005.

18. Attached hereto as Exhibit Q is a true and accurate copy of an article from PokerNews entitled *The Business of Poker – Interview with Ray Bitar, CEO of Tiltware.*

Signed and sworn this 19th Day of June, 2006.

Cecilia P. Ventimiglia

SUBSCRIBED and sworn to before me

This 19th day of June, 2006.

Danette Young

Notary Public

DANETTE YOUNG
Notary Public, State of Nevada
Appointment No. 06-102395-1
My Appt. Expires Jan. 9, 2010